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July 28, 2014

VIA FACSIMILE (609) 989-0451

The Honorable Douglas E. Arpert, U.S.M.J.
 United States District Court
 Clarkson S. Fisher Building & U.S. Courthouse
 402 East State Street
 Trenton, NJ 08608

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JUL 29 2014

DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

Re: Helsinn Healthcare S.A., et. al. v. Dr. Reddy's Laboratories, Ltd., et al.
Civil Action No. 11-3962 (MLC)(DEA)

Dear Judge Arpert:

This firm, together with Paul Hastings LLP and Loeb & Loeb LLP, represents Plaintiffs Helsinn Healthcare S.A. and Roche Palo Alto LLC ("Plaintiffs") in the above-captioned matter.

In light of certain pending discovery issues that the parties are still working to resolve, the parties have agreed to a modest adjustment to the schedule in this case. Accordingly, enclosed for Your Honor's consideration is the parties' proposed amended case schedule. Consistent with Your Honor's usual preference, we have included blank spaces for the insertion of dates for periodic telephone status conferences with the Court, which could displace any currently scheduled teleconferences. If this meets with the Court's approval, we respectfully request that Your Honor sign the below form of endorsement and enter the schedule on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

William C. Baton

cc: All Counsel (via e-mail)

SO ORDERED on this 30th day of July, 2014.

Hon. Douglas E. Arpert, U.S.M.J.

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

Event	Current Schedule	Proposed Schedule
Close of fact discovery	July 22, 2014	July 22, 2014 ¹
Meet and Confer Deadline to propose <i>Markman</i> Hearing under Local Rule 4.6	July 22, 2014	July 31, 2014
<i>Markman</i> Hearing	Subject to Court's Availability	Subject to Court's Availability
Disclose any reliance on advice of counsel	30 days after entry of <i>Markman</i> order, OR 2 weeks before Plaintiffs serve draft Pretrial Order text, whichever earlier	30 days after entry of <i>Markman</i> order, OR 2 weeks before Plaintiffs serve draft Pretrial Order text, whichever earlier
Opening expert reports (addressing claims or defenses for which a party bears the burden of proof)	July 25, 2014	August 15, 2014
Rebuttal expert reports	August 25, 2014	September 15, 2014
Reply expert reports	September 19, 2014	October 10, 2014
Close of expert discovery	November 12, 2014	November 26, 2014
Deadline to file dispositive motions ('219 patent)	On or before August 12, 2014	On or before September 5, 2014
Opposition briefs to dispositive motions	Due 4 weeks after motion filed	Due 4 weeks after motion filed
Reply briefs to dispositive motions	Due 3 weeks after opposition brief filed	Due 3 weeks after opposition brief filed
Exchange list of legal issues	November 17, 2014	December 3, 2014
Exchange fact witness lists (aside from those witnesses called for impeachment purposes, only the witnesses set forth may testify at trial)	November 24, 2014	December 8, 2014
Exchange expert witness lists (no expert shall be permitted to testify at trial unless identified at this time)	November 24, 2014	December 8, 2014
Exchange objections to fact and expert witness lists	December 9, 2014	December 22, 2014
Exchange exhibit lists	December 19, 2014	January 9, 2015
Exchange electronic collection of exhibits from parties' respective exhibit lists in a mutually acceptable format	December 19, 2014	January 9, 2015
Exchange objections to the opposing party's exhibit list	January 9, 2015	January 30, 2015

¹Except as to any discovery relating to requests served before July 22, 2014, that is either agreed upon by the parties or ordered by the Court.

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

Event	Current Schedule	Proposed Schedule
Exchange affirmative deposition designations	December 12, 2014	December 22, 2015
Exchange deposition counter-designations and objections to affirmative designations	January 16, 2015	January 23, 2015
Exchange objections to counter designations	January 30, 2015	February 6, 2015
Exchange stipulation of facts for the issues on which the parties have the burden of proof	December 16, 2014	December 22, 2014
Exchange responses to stipulation of facts	January 9, 2015	January 16, 2015
Exchange contested facts	January 30, 2015	February 3, 2015
Exchange lists of the parties' contemplated motions <i>in limine</i>	December 5, 2014	December 12, 2014
Meet and confer in an attempt to reach mutual resolutions regarding the parties' contemplated motions <i>in limine</i>	December 12, 2014	December 19, 2015
Serve opening motions <i>in limine</i>	December 19, 2014	January 16, 2015
Serve responses to motions <i>in limine</i>	January 16, 2015	February 6, 2015
Plaintiffs serve draft Pretrial Order text	February 6, 2015	February 13, 2015
Defendants serve rebuttal to Plaintiff's draft Pretrial Order text	February 13, 2015	February 20, 2015
Proposed Final Pretrial Order Due	February 20, 2015	February 27, 2015
Final Pretrial Conference *	Subject to Court's availability; consistent with a requested April 2015 trial date	Subject to Court's availability; consistent with a requested April 2015 trial date
Trial Briefs and Proposed Findings of Facts and Conclusions of Law	One week after Final Pretrial Conference	One week after Final Pretrial Conference
Trial	Subject to Court's availability; parties will request an April 2015 trial date	Subject to Court's availability; parties have requested an April 2015 trial date

The Court shall conduct a teleconference on November 6, 2014 at 10:30 am.

The Court shall conduct a teleconference on January 5, 2015 at 2:00 pm

* The Court shall conduct a teleconference on the Final Pretrial Conference on March 2, 2015 at 11:00 am